



U.S. Department of Justice

United States Attorney
Southern District of New YorkThe Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 28, 2021

By ECF

Honorable Richard M. Berman
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

Re: *United States v. Balducci, 21 Cr. 355 (RMB)*

Dear Judge Berman:

The Government writes respectfully in advance of the upcoming status conference in this case, which is currently scheduled for August 2, 2021. Defense counsel has advised that the defendant requires additional time to review discovery, and the parties also seek additional time to discuss a potential pretrial resolution. Accordingly, the parties respectfully request that the August 2 conference be adjourned for approximately thirty (30) days to a date and time convenient for the Court.

For similar reasons, including allowing the defendant to continue reviewing discovery and to permit the parties additional time to discuss a potential pretrial disposition, the Government further requests that time be excluded under the Speedy Trial Act from August 2, 2021, through the date of any newly-scheduled proceeding. *See* 18 U.S.C. § 3161(h)(7)(A). The Government has conferred with defense counsel, who consents to the adjournment and exclusion of time.

Respectfully submitted,

AUDREY STRAUSS
 United States Attorney
 Southern District of New York

By: /s/ Jarrod L. Schaeffer
 Jarrod L. Schaeffer
 Assistant United States Attorney
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Application granted. Conference
adjourned to Wednesday, September
22, 2021 at 10:30 AM. Time is excluded
pursuant to the Speedy Trial Act for the
reasons set forth in this letter.

SO ORDERED:
 Date: 7/28/21

Richard M. Berman, U.S.D.J.